

**Annual 47 CFR § 64.2009(e) CPNI Certification Template**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Date filed: February 28, 2019
2. Name of company(s) covered by this certification: T-NETIX Telecommunications Services, Inc.
3. Form 499 Filer ID: 811751
4. Name of signatory: Dennis J. Reinhold
5. Title of signatory: Senior Vice President and General Counsel
6. Certification:


I, Dennis J. Reinhold, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 CFR § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company *has not* taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. [NOTE: If you reply in the affirmative, provide an explanation of any actions taken against data brokers.]


The company *has not* received customer complaints in the past year concerning the unauthorized release of CPNI. [NOTE: If you reply in the affirmative, provide a summary of such complaints. This summary must include the number of complaints, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.]

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed  [Signature of an officer, as agent of the carrier]

**Attachments:**      Accompanying Statement explaining CPNI procedures  
                                 Explanation of actions taken against data brokers (if applicable)  
                                 Summary of customer complaints (if applicable)

Reviewed and approved by Securus' Assistant General Counsel and Chief Compliance Officer.

 2/28/19

**Attachment 1**

T-NETIX, Inc. / T-NETIX Telecommunications Services, Inc. ("T-NETIX" or the "Company") offers telecommunications services to law enforcement agencies and to inmates at confinement facilities, including the ability for inmates to complete interstate and international prepaid and collect calls ("inmate calling services"), pursuant to contracts that the Company enters with the administrators of the individual facilities.

To the extent that T-NETIX collects any customer proprietary network information ("CPNI") in providing such services, the Company has internal procedures in place to ensure the security of the data, including its retention in secure password-protected files and other network access security measures. Employees are trained and understand the requirements to keep such information confidential.

Any such information is not sold, rented or otherwise made available to third parties, except to the extent permitted by applicable law and regulation (e.g., 47 U.S.C. 222(d)), including to ensure that inmates do not make fraudulent, abusive or illegal use of telecommunications privileges afforded by the confinement facility administrators.

T-NETIX does not make CPNI available to its sales personnel and does not use, disclose or permit access to CPNI for internal marketing purposes (i.e., for the marketing among classes of services). T-NETIX does make CPNI available to law enforcement agencies in connection with assorted services offered to law enforcement agencies, including services that allow law enforcement agencies to obtain the approximate geographical location of a called party. In cases in which a warrant or other lawful order is provided to T-NETIX, T-NETIX provides the relevant CPNI to law enforcement agencies in compliance with the applicable warrant or order.

T-NETIX's Senior Vice President and General Counsel, Dennis Reinhold, understands the FCC CPNI Rules govern T-NETIX's use and control of any CPNI purposes.